

**TritonPCS  
1100 Cassatt Road  
Berwyn, PA 19312**

**Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 –12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554**

**Re: WT Docket No. 01-309  
HAC Digital Wireless Telephones**

**First Semi-Annual Report**

Dear Ms. Dortch:

Triton PCS, Inc. and its licensee subsidiary Triton PCS License Company, L.L.C. (collectively “Triton”) hereby submits its first semi-annual report pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission’s Report and Order (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 (“R&O”) in the above-referenced proceeding.

Triton is a Tier II Commercial Mobile Radio Service licensee, as defined in the Commission’s E-911 Order to Stay, 17 FCC Rcd 14841 (2002). Triton holds PCS licenses for markets in portions of North Carolina, South Carolina, Virginia, Kentucky, West Virginia, Georgia, and Tennessee. The digital portion of Triton’s wireless system employs the Time Division Multiple Access (“TDMA”) and Global Systems Mobile (“GSM”) air interfaces. Triton currently markets the following TDMA digital wireless telephones: A) Motorola Models C332t, v60i, and v60t; B) Nokia Models 2260, 3560, 6360, 6560, and 9265; and C) Panasonic Model Allure. Triton also currently markets the following GSM digital wireless telephones: A) Motorola Models C333, C350, T720, T721, V70, and V400; B) Nokia Models 3100, 3200, 3300, 3595, 6680, 6800, 7210 and the Danger HipTop; C) Panasonic Model X70; and D) Siemens Model SL56. Upon Triton’s information and belief, none of these units meets the requirements for a U3 rating under ANSI Standard C63.19.

To achieve compliance with the Hearing Aid Compatibility (“HAC”) requirements of the R&O, Triton is dependent upon its handset manufacturers to develop and market HAC-compliant digital wireless handsets. As a Tier II wireless carrier, Triton has no influence over the product development and distribution decisions of wireless handset manufacturers and, accordingly, must rely on the manufacturers to develop HAC-compliant digital wireless handsets for use of on Triton’s systems.

Given the forgoing, the information requested by the Commission is identified as follows:

**Item 1 -- Digital Wireless Phones Tested:** Triton has not yet tested any digital wireless telephones for HAC compliance. Initial testing will be done by the handset manufacturers.

**Item 2 -- Laboratory Used:** None. See Response to Item 1.

**Item 3 -- Test Results for Each Phone Tested:** Not applicable. See Response to Item 1.

**Item 4 -- Identification Of Compliant Phone Models and Ratings According To ANSI C63.19:** Upon information and belief, none of the handsets marketed by Triton qualify for a U3 rating under ANSI Standard C63.19.

**Item 5 -- Report On The Status Of Product Labeling:** None. It is anticipated that product labeling will be handled by the handset manufacturers.

**Item 6 -- Report On Outreach Efforts:** Triton is developing a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs.

**Item 7 -- Information Related To Retail Availability of Compliant Phones:** Upon information and belief, there are currently no handsets commercially available that qualify for a U3 rating under ANSI Standard C63.19.

**Item 8 -- Information Related To Incorporating Hearing Aid Compatibility Features Into Newer Models Of Digital Wireless Phones:** The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the handset manufacturers.

**Item 9 -- Any Activities Related To ANSI 63.19 Or Other Standards Work Intended To Promote Compliance With The Requirements Of The Commission's Report and Order:** None.


**Item 10 -- Total Numbers Of Compliant And Non-Compliant Phone Models Offered As Of The Date Of This Report:** Upon information and belief, there are currently no handsets commercially available that qualify for a U3 rating under ANSI Standard C63.19. The TDMA and GSM digital wireless phone models marketed by Triton are as set forth in the second paragraph of this report and, upon information and belief, none of these models qualifies for U3 rating under ANSI Standard C63.19.

**Item 11 -- Any Ongoing Efforts For Interoperability Testing With Hearing Aid Devices:** Initial interoperability testing will be performed by the handset manufacturers.

Very truly yours,

**TritonPCS**

Dated: 5/17/04

By: 

**In accordance with Rule Section 1.12, please refer any inquiries or correspondence to:**

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